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AUG 12 2025

CLERK U S DISTRICT COURT
DISTRICT OF ARIZONA
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REDACTED FOR
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

12 | United States of America,

No. CR25-931-PHX-DGC

13 Plaintiff,

REDACTED
SUPERSEDING INDICTMENT

VIO: 18 U.S.C. §§ 922(g)(5) and 924(a)(8)
(Alien in Possession of Firearms and
Ammunition)
Count 1

17 2. Linet Vartanniavartanians,
(Counts 2-3)

18 U.S.C. §§ 922(g)(5), 924(a)(8) and 2
(Alien in Possession of Firearms and
Ammunition, Aid and Abet)
Count 2

Defendants.

18 U.S.C. § 115(a)(1)(B)
(Threats Against a Law Enforcement
Officer)
Count 3

22
23 18 U.S.C. §§ 924(d) and 981;
24 21 U.S.C. §§ 853 and 881; and
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

28 | THE GRAND JURY CHARGES:

INTRODUCTION

2 1. Defendant MEHRZAD ASADI EIDIVAND, an Iranian national residing in
3 Tempe, Arizona, was issued an order of removal on November 25, 2013. Defendant
4 MEHRZAD ASADI EIDIVAND has attempted to challenge the order of removal, but all
5 attempts have been unsuccessful.

BACKGROUND

7 2. On June 21, 2025, around 8:55 p.m., Immigration and Customs
8 Enforcement (ICE), Enforcement and Removal Operations (ERO) officers went to
9 Defendants MEHRZAD ASADI EIDIVAND and LINET
10 VARTANNIAVARTANIANS's residence in Tempe, Arizona, to arrest Defendant
11 MEHRZAD ASADI EIDIVAND on administrative immigration violations.

12 3. ICE/ERO officers knocked on the door and announced they were police.
13 Upon approach, ICE/ERO officers observed multiple surveillance cameras near the
14 entryway. Approximately two ICE/ERO officers were around the door while
15 approximately four other ICE/ERO officers were surrounding the residence, all wearing
16 vests which depicted they were “Police,” “Police Federal Agent,” or “ICE.”

17 4. ICE/ERO officers identified themselves as police, and said they were
18 looking to speak with "Mehrzed Asadi Eidivand." Defendant LINET
19 VARTANNIAVARTANIANS stated she was not going to open the door. Defendant
20 LINET VARTANNIAVARTANIANS told them to come back with a warrant.

21 5. ICE/ERO officers began to walk away. However, a couple minutes later an
22 ICE/ERO officer approached again to ask her name. Defendant LINET
23 VARTANNIAVARTANIANS said she was not going to talk to them and to come back
24 with a warrant.

25 6. ICE/ERO officers disengaged again and went to their vehicles to regroup.

26 7. At all times described in this Indictment, the ICE/ERO officers were
27 engaged in the performance of their official duties.

28 8. Shortly thereafter, officers from the Tempe Police Department (TPD)

1 arrived on the scene. As multiple TPD officers approached, they shared that Defendant
2 LINET VARTANNIAVARTANIANS had called 911.

3 9. Defendant LINET VARTANNIAVARTANIANS, in a recorded 911 phone
4 call, said the following, among other things:

- 5 a. "I'm not letting anybody enter my home without my, you know,
6 permission. So anybody that tries to invade my home, I'm going to
7 shoot them. Like I said, I have a gun, and it's loaded."
- 8 b. "Anybody trying to enter my house is going to be shot. I don't
9 allow anybody in my house, including ICE."
- 10 c. When asked about the location of the gun, she responded "in my hand
11 right now."
- 12 d. "I go outside the backyard, and I'll just shoot them in the head."

13 10. Defendant MEHRZAD ASADI EIDIVAND spoke with TPD officers over
14 the phone, stating he is a patriot and does not agree with what is going on. When a TPD
15 officer asked him about guns, Defendant MEHRZAD ASADI EIDIVAND said "we do
16 have guns."

17 11. On June 22, 2025, Homeland Security Investigations (HSI) agents and
18 ICE/ERO officers executed a federal search warrant at Defendants MEHRZAD ASADI
19 EIDIVAND and LINET VARTANNIAVARTANIANS's residence in Tempe, Arizona.

20 12. During the search of their residence, agents found firearms and ammunition.

- 21 a. On the kitchen counter and visible upon entry, agents found a Glock,
22 45, 9mm, handgun, Serial Number (S/N): BSTM071. This firearm
23 was loaded with a magazine containing 10 rounds of 9 x 19 mm
24 caliber Hornady ammunition.
- 25 b. On the bedroom nightstand, in the bedroom shared by Defendants
26 MEHRZAD ASADI EIDIVAND and LINET
27 VARTANNIAVARTANIANS, agents found a Masada, ORP, 9mm,

handgun, S/N: M1022117. This firearm was loaded with a magazine containing 15 rounds of 9 x 19 mm caliber Hornady ammunition.

c. In the bedroom closet of the bedroom shared by Defendants MEHRZAD ASADI EIDIVAND and LINET VARTANNIAVARTANIANS, agents found 740 rounds of Tula 9 x 19 mm caliber ammunition and an additional magazine loaded with 10 rounds of Tula 9 x 19 mm caliber ammunition.

8 13. The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) evaluated
9 the firearms and ammunition found at Defendants' residence, listed in paragraph 12, and
10 determined all had travelled in interstate and/or foreign commerce.

11 14. Based upon the make, model, and serial number of the firearms, law
12 enforcement learned that Defendant LINET VARTANNIAVARTANIANS purchased
13 both firearms on June 11, 2021 in Addison, Texas.

COUNT 1

15. The factual allegations above are incorporated for Count 1.

16 16. Beginning by at least June 21, 2025, and continuing through June 22, 2025,
17 in the District of Arizona, Defendant MEHRZAD ASADI EIDIVAND, knowing that he
18 was an alien illegally and unlawfully in the United States, did knowingly possess firearms
19 and ammunition, to wit:

- (1) a Glock, 45, 9mm, handgun, S/N: BSTM071;
 - (2) 10 rounds of 9 x 19 mm caliber Hornady ammunition (contained within the magazine inserted into the Glock Handgun),
 - (3) a Masada, ORP, 9mm, handgun, S/N: M1022117,
 - (4) 15 rounds of 9 x 19 mm caliber Hornady ammunition (contained within the magazine inserted into the Masada handgun),
 - (5) 10 rounds of 9 x 19 mm caliber Tula ammunition, and
 - (6) 740 rounds of 9 x 19 mm caliber Tula ammunition,

28 all of which were previously shipped or transported in interstate and/or foreign commerce.

1 17. In violation of Title 18, United States Code, Sections 922(g)(5) and
2 924(a)(8).

COUNT 2

4 | 18. The factual allegations above are incorporated for Count 2.

5 19. Beginning by at least June 21, 2025, and continuing through June 22, 2025,
6 in the District of Arizona, Defendant LINET VARTANNIAVARTANIANS, knowing
7 Defendant MEHRZAD ASADI EIDIVAND was an alien illegally and unlawfully in the
8 United States, did knowingly aid and abet Defendant MEHRZAD ASADI EIDIVAND in
9 the possession of firearms and ammunition as alleged in Count 1.

10 20. In violation of Title 18, United States Code, Sections 922(g)(5), 924(a)(8)
11 and 2.

COUNT 3

13 | 21. The factual allegations above are incorporated for Count 3.

14 22. On or about June 21, 2025, in the District of Arizona, Defendant LINET
15 VARTANNIAVARTANIANS, did threaten to assault and kill certain ICE/ERO officers
16 who were present at her residence on that day, the ICE/ERO officers being persons
17 designated and protected under Title 18, United States Code Section 1114, and Defendant
18 LINET VARTANNIAVARTANIANS did so with the intent to impede, intimidate, or
19 interfere with the ICE/ERO officers while they were engaged in the performance of their
20 official duties, by stating she was going to shoot ICE agents as further detailed in Paragraph
21 9.

22 23. In violation of Title 18, United States Code, Section 115(a)(1)(B).

FORFEITURE ALLEGATION

24 The Grand Jury realleges and incorporates the allegations of Counts 1 and 2 of this
25 Superseding Indictment, which is incorporated by reference as though fully set forth herein.

Pursuant to 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, and 28 U.S.C. § 2461(c), and upon conviction of the offenses alleged in Counts 1 and 2 of this Superseding Indictment, defendants shall forfeit to the United States of America all right,

1 title, and interest in (a) any property constituting, or derived from, any proceeds the person
2 obtained, directly or indirectly, as the result of the offense, and (b) any of defendants'
3 property used, or intended to be used, in any manner or part, to commit, or to facilitate the
4 commission of, such offense as to which property defendants are liable, including, but not
5 limited to, the following property involved and used in the offense:

- 6 (1) a Glock, 45, 9mm, handgun, S/N: BSTM071;
- 7 (2) 10 rounds of 9 x 19 mm caliber Hornady ammunition,
- 8 (3) a Masada, ORP, 9mm, handgun, S/N: M1022117,
- 9 (4) 15 rounds of 9 x 19 mm caliber Hornady ammunition,
- 10 (5) 10 rounds of 9 x 19 mm caliber Tula ammunition, and
- 11 (6) 740 rounds of 9 x 19 mm caliber Tula ammunition,

12 If any of the above-described forfeitable property, as a result of any act or omission
13 of defendant:

- 14 (1) cannot be located upon the exercise of due diligence,
- 15 (2) has been transferred or sold to, or deposited with, a third party,
- 16 (3) has been placed beyond the jurisdiction of the court,
- 17 (4) has been substantially diminished in value, or
- 18 (5) has been commingled with other property which cannot be divided
19 without difficulty, it is the intent of the United States to seek forfeiture
20 of any other property of said defendants up to the value of the above-
21 described forfeitable property, pursuant to 21 U.S.C. § 853(p).

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1 All in accordance with Title 18, United States Code, Sections 924(d), 981 and 982,
2 Title 21, United States Code, Sections 853 and 881, Title 28, United States Code Section
3 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

4

5 A TRUE BILL

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7 _____
8 /s/
9 FOREPERSON OF THE GRAND JURY
10 Date: August 12, 2025

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12 TIMOTHY COURCHAINE
13 United States Attorney
14 District of Arizona

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16 _____
17 /s/
18 ADDISON OWEN
19 RACHEL E. NAVA
20 Assistant U.S. Attorney

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